

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

JAMES RYALS, JR., et al.,

Plaintiffs,

v.

HIRERIGHT SOLUTIONS, INC., et al.,

Defendants.

Civil Action No. 3:09cv625

**MOTION FOR ENTRY OF ORDER GOVERNING USE AND DISCLOSURE OF CLASS
MEMBER INFORMATION**

Defendants, with the consent of Plaintiffs' counsel, move the Court pursuant to Rule 23(d)(1)(E) of the Federal Rules of Civil Procedure for entry of an Order governing the disclosure and use of the class lists and class member information described in the proposed Settlement Agreement filed in this case. A copy of the proposed order is attached as Exhibit A.

Section 4.1 of the proposed Settlement Agreement provides that Defendant HireRight Solutions, Inc. ("HireRight Solutions") shall create four class lists containing the names of the four groups of consumers eligible to receive payments as class members under the proposed Settlement Agreement. Section 4.1 further provides that HireRight Solutions shall, to the extent reasonably retrievable, provide to the Settlement Administrator the Social Security number, date of birth, electronic mail address, and most recent mailing address for each consumer on each of these class lists.

To ensure the proper confidential treatment of the identities and other sensitive personal

information of the class members, Defendants seek entry of the attached proposed Order authorizing Defendants to disclose such information to the Settlement Administrator in this case, *see* 15 U.S.C. § 1681b(a)(1), and to limit further dissemination and use of this sensitive personal information.

Date: July 12, 2011

Respectfully submitted,

/s/ Amy R. Davis

Amy R. Davis

VA Bar Number 72872

Attorney for Defendants

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC 20005

(202) 434-5000

(202) 434-5029 (facsimile)

adavis@wc.com

Dane H. Butswinkas (Va. Bar No. 30562)

dbutswinkas@wc.com

F. Greg Bowman (Admitted *Pro Hac Vice*)

fbowman@wc.com

Daniel P. Shanahan (Admitted *Pro Hac Vice*)

dshanahan@wc.com

Attorneys for Defendants

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.

Washington, DC 20005

(202) 434-5000

(202) 434-5029 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Matthew James Erausquin
Consumer Litigation Associates PC
1800 Diagonal Road
Suite 600
Alexandria, VA 22314
703-273-6080
Fax: 888-892-3512
E-mail: matt@clalegal.com

Christopher Colt North
751-A Thimble Shoals Blvd.
Newport News, VA 23606
(757) 873-1010
E-mail: cnorthlaw@aol.com

Leonard Anthony Bennett
Consumer Litigation Assoc PC
12515 Warwick Blvd
Suite 100
Newport News, VA 23606
757-930-3660
Fax: 757-930-3662
E-mail: lenbennett@cox.net

Counsel for Plaintiffs

/s/ Amy R. Davis
Amy R. Davis
VA Bar Number 72872
Attorney for Defendants
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
(202) 434-5000
(202) 434-5029 (facsimile)
adavis@wc.com